

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|--|---|
| Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA ECF

January 4, 2021

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") write to request an extension of time by which to either file agreed-to redactions of the motion papers relating to witness Akram Alzamari or submit a joint-letter detailing the unresolved disputes for the Court's consideration. *See* ECF No. 6545.

This Court previously granted the Department of Justice request to extend the time by which the redacted motion papers or a joint-letter was to be filed until January 4, 2021. *Id.* In accordance with the Court's adjusted scheduling, the Department of Justice presented its proposed redactions on December 15, 2021. The parties are meeting-and-conferring this week and to try to narrow the disputes presented to the Court concerning redactions, the PECs ask that the January 4, 2021 date be extended by one-week so as to allow counsel to engage in the meet-and-confer process, and then either file redacted moving papers by January 11, 2021 or a joint-letter to the Court outlining any disputes regarding proposed redactions.

Counsel for the Department of Justice, Mr. Alzamari, the Kingdom of Saudia Arabia and Dallah Avco do not object to this request for a one-week extension of time.

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Respectfully submitted,

KREINDLER & KREINDLER

/s/ Megan W. Benett

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

COZEN O'CONNOR

/s/ Sean P. Carter

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

cc: All counsel of record via ECF

MOTLEY RICE

/s/ Robert T. Haefele

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims